

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ROBERT PORZIO, Individually and On :
Behalf of All Others Similarly Situated, :
Plaintiff, :
vs. : Case No. 12 Civ. 07948-SAS
OVERSEAS SHIPHOLDING GROUP, INC., :
MORTEN ARNTZEN, and MYLES R. :
ITKIN, :
Defendants. :
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PAUL OTTO KOETHER IRA ROLLOVER, :
on Behalf of Itself and All Others Similarly :
Situated, :
Plaintiff, :
vs. :
MORTEN ARNTZEN, MYLES R. ITKIN, :
OUDI RECANATI, G. ALLEN ANDREAS :
III, ALAN R. BATKIN, THOMAS B. :
COLEMAN, CHARLES A. FRIBOURG, :
STANLEY KOMAROFF, SOLOMON N. : Case No. 12-cv-09104
MERKIN, JOEL I. PICKET, ARIEL :
RECANATI, THOMAS F. ROBARDS, JEAN- :
PAUL VETTIER, MICHAEL J. :
ZIMMERMAN, CITIGROUP GLOBAL :
MARKETS, INC., MORGAN STANLEY & :
CO. INCORPORATED, HSBC SECURITIES :
(USA) INC., DEUTSCHE BANK :
SECURITIES INC., DnB NOR MARKETS, :
INC., GOLDMAN, SACHS & CO., ING :
FINANCIAL MARKETS LLC, :
PRICewaterhouseCOOPERS LLP, :
Defendants. :
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BRUCE MYATT, Individually and On Behalf :
of All Others Similarly Situated,

Plaintiff,

vs.

MORTEN ARNTZEN, and MYLES R.
ITKIN,

Defendants.

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Case No. 12-cv-08547-LLS

**RESPONSE OF BARRIE WOOLARD AND STEVEN HYMAN
TO COMPETING MOTIONS FOR APPOINTMENT
OF LEAD PLAINTIFFS AND LEAD COUNSEL**

Barrie Woolard (“Mr. Woolard”) and Steven Hyman (“Mr. Hyman”) respectfully submit this response to the competing motions for appointment of Lead Plaintiffs in the above-captioned related actions.

Having reviewed the competing motions filed by movants for appointment as lead plaintiffs, it appears that Mr. Woolard and Mr. Hyman do not possess the “largest financial interest in the relief sought by the class” as required by the PSLRA. 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(bb); 15 U.S.C. § 77z-1(a)(3)(B)(iii)(I)(bb). For this reason, Mr. Woolard and Mr. Hyman do not oppose the motions of other movants who have filed motions to be appointed as Lead Plaintiffs.

If, for any reason, other movants are unable to serve as Lead Plaintiff(s) in this action, Mr. Woolard and Mr. Hyman stand ready to serve as Lead Plaintiffs if called upon by the Court.

Dated: January 14, 2013

Respectfully submitted,
COHEN MILSTEIN SELLERS
& TOLL PLLC

/s/ Michael Eisenkraft

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***Attorneys for Movants Barrie Woolard and Steven
Hyman***

CERTIFICATE OF SERVICE

I certify that on January 14, 2013, I caused to be electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel of record in this matter who are registered on the CM/ECF.

/s/ *Kenneth M. Rehns*

Kenneth M. Rehns (KR-9822)